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*Attorneys for Defendant Capital One, N.A.,
 erroneously sued as "Capital One Bank, N.A."*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

SEAN BONDOCAN,

Plaintiff,

v.

TRANS UNION, LLC, EQUIFAX
 INFORMATION SERVICES, LLC;
 EXPERIAN INFORMATION SOLUTIONS,
 INC.; JP MORGAN CHASE BANK, N.A.;
 SYNCHRONY FINANCIAL; AMERICAN
 EXPRESS INC.; CAPITAL ONE BANK, N.A.;
 and SILVER STATE SCHOOLS CREDIT
 UNION,

Defendants.

CASE NO.: 2:23-cv-01334-JCM-VCF

**~~STIPULATION AND ORDER TO
 EXTEND DISCOVERY PLAN AND
 SCHEDULING ORDER (ECF NO. 23)~~
 (FIRST REQUEST)**

Plaintiff Sean Bondocan ("Plaintiff") and Defendants Synchrony Financial and Capital One, N.A., erroneously sued as Capital One Bank, N.A. ("Defendants") (jointly as the "Parties"), by and through their respective counsel, hereby timely stipulate pursuant to Local Civil Rule 26-3 to extend upcoming deadlines in the Discovery Plan and Scheduling Order ("Scheduling Order") entered by this Court (the "Deadlines") on November 2, 2023 (ECF No. 23) by ninety (90) days.

Good cause exists to extend the Deadlines. Capital One, N.A.'s counsel of record was retained in December of 2023 and Capital One, N.A. only just officially appeared in the Action by filing its Answer to the Plaintiff's Complaint on December 22, 2023. Moreover, while Synchrony Financial and Plaintiff have been engaged in discovery (including written discovery

and scheduling party depositions), the Parties, including due to Capital One's very recent initial appearance in the case, request an additional ninety (90) days to the upcoming Deadlines to engage in discovery as well as to continue to devote efforts and resources to explore the potential for early resolution. This is the first request for an extension to the Scheduling Order, the Parties have agreed to the brief extension, and no prejudice will result to any Party to the Action. Therefore, it is appropriate to extend the upcoming Deadlines in the Scheduling Order.

The Parties therefore respectfully request to extend the upcoming Deadlines in the Scheduling Order making the new proposed upcoming Scheduling Order Deadlines as follows:

1. Expert Disclosures (initial): April 17, 2024
2. Expert Disclosures (rebuttal): May 20, 2024
3. Discovery Cutoff: June 17, 2024
4. Dispositive Motions: July 16, 2024
5. Pretrial Order: August 15, 2024

In the event that dispositive motions are filed, the date for filing the joint pre-trial order shall be suspended until **30 days after** decision on the dispositive motions or until further order of the Court.

DATED: December 22, 2023.

McDONALD CARANO LLP

By: /s/ Karyna M. Armstrong
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*Attorneys for Defendant Capital One,
 N.A., erroneously sued as "Capital One
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1 DATED: December 22, 2023

FREEDOM LAW FIRM, LLC

2 By: /s/ Gerardo Avalos

3 George Haines, Esq. (NSBN 9411)
4 Gerardo Avalos, Esq. (NSBN 15171)
5 8985 South Eastern Ave., Ste. 100
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Attorneys for Plaintiff Sean Bondocan

7 DATED: December 22, 2023.

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8 By: /s/ Brittni A. Tanenbaum

9 J. Christopher Jorgensen, Esq. (NSBN 5382)
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12 Las Vegas, Nevada 89169

Attorneys for Defendant Synchrony Financial

13 **SCHEDULING ORDER**

14 IT IS HEREBY ORDERED that the Discovery Plan and Scheduling Order is modified to
15 extend the discovery deadlines as stated above.
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17 IT IS SO ORDERED:

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19 UNITED STATES MAGISTRATE JUDGE

20 DATED: December 27, 2023
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